



1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005  
Office 202/326-3815

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James K. Smith  
Director  
Federal Relations

March 19, 1998

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

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MAR 19 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: **Ex Parte Filing**  
CC Docket 97-213

Dear Ms. Salas:

On Wednesday, March 18, 1998, Mr. Don Auble, Ms. Barbara Kern and I met with Mr. Don Stockdale, Associate Bureau Chief, Common Carrier Bureau, Mr. Kent Nilsson, Deputy Chief, Network Services Division, Mr. David Ward, Network Services Division, and Mr. Charles Iseman, Mr. David Sylvar, Mr. Larry Petak and Mr. James Burtle of the Office of Engineering and Technology. The purpose of the meeting was to discuss the position taken by Ameritech in its pleadings filed in this proceeding as set forth in the attachment hereto.

Sincerely,

Attachment

cc: D. Stockdale  
K. Nilsson  
D. Ward  
C. Iseman  
D. Sylvar  
L. Petak  
J. Burtle

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# **FCC Notice of Proposed Rulemaking CC Docket No. 97-213**



# **Extensions of Time**

- **Section 107 criteria**
  - Availability of a standard, plus 24 months to implement
  - Complexity of requirements
  - Overdue Final Capacity Notice just available
- **Solutions not available**
  - Not one switch manufacturer will have a solution available for 10/25/98.
  - Network-based solutions are not available.

# **Internal Procedures**

- **Keep it simple**
  - Procedures already exist
  - Affidavits from all employees unnecessary
- **Reporting requirements to FBI**
  - 2 hour response time for implementation too stringent
  - Ameritech accommodates need for exigent circumstances
  - Centralized Ameritech security operations are efficient

# **Internal Procedures**

- **Reporting requirements to FCC**
  - **Appropriate authorization is Court Order**
  - **No justification for reporting of unlawful wiretaps to FCC**
  - **No justification for differential treatment of carriers**